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February 26, 2018

BY ECF

Honorable Jesse M. Furman  
United States District Judge  
United States District Court  
Southern District of New York  
40 Centre Street, Room 2202  
New York, NY 10007

USDC SDNY  
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Re: Rehal v. Weinstein, et al.  
18-cv-674 (JMF)

Dear Judge Furman:

Together with the Genie Harrison Law Firm, APC, we represent the plaintiff Sandeep Rehal, in the above-referenced matter. We write to inform the Court that we are unable to amend the Complaint to allege the citizenship of the Weinstein Company LLC defendants as required by your Honor's January 29, 2018 Order. Although plaintiff has alleged the principal place of business and incorporation of the Weinstein corporate entities and takes the position that should be sufficient for diversity jurisdiction, *see Lincoln Benefit Life Co. v. AEI Life, LLC*, 800 F.3d 99, 111-113 (3d Cir. 2015), we understand the law in this Circuit is to the contrary, and will result in the dismissal of the Complaint by the Court for lack of subject matter jurisdiction.

Respectfully submitted,



Laura S. Schnell

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A complaint that fails to plead the citizenship of all relevant parties does not properly assert diversity jurisdiction. *See, e.g., Leveraged Leasing Admin. Corp. v. PacifiCorp Capital, Inc.*, 87 F.3d 44, 47 (2d Cir. 1996). Because Plaintiff's complaint does not allege the citizenship of each constituent person or entity comprising the Defendant LLCs, (Docket No. 16), and because Plaintiff was unable to amend her complaint to allege the citizenship of each member of the Defendant LLCs, (Docket No. 30), the case is hereby DISMISSED for lack of subject-matter jurisdiction. *See Fed. R. Civ. P. 12(h)(3)*. The Clerk of Court is directed to close the case. All conferences are cancelled.

SO ORDERED.



February 26, 2018

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